

JUDGE'S COPY

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FILED
HARRISBURG, PA

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

JUL 03 2002

WILLIAM CLARK,
Plaintiff

NO.: 1:CV01-0764

MARY E. D'AMOREA, CLERK
Per RB
Deputy Clerk

(JUDGE CALDWELL)

v.

MARTIN HORN, et al.,
Defendants

JURY TRIAL DEMANDED

DEFENDANTS, WEXFORD HEALTH SOURCES, INC.
AND JOHN SYMONS, M.D.'S MOTION TO
ENLARGE TIME TO FILE A BRIEF

AND NOW, come Defendants, Wexford Health Sources, Inc. and John Symons, M.D., by and through their attorneys, Lavery, Faherty, Young & Patterson, P.C., and file this Motion to Enlarge Time to File a Brief and in support thereof, aver as follows:

1. On June 7, 2002, undersigned counsel received Plaintiff's Motion to Compel Discovery for Production of Defendant's [sic] Wexford Health Sources, Inc. and John Symons, M.D.'s documents and proposed Court Order.

2. By Order dated June 12, 2002, this Honorable Court instructed Plaintiff to file a Brief in support of its Motion to Compel Production of Documents on the Wexford Defendants within ten (10) days. In that Order, this Honorable Court also directed Plaintiff to address any objections raised by the Defendants in their discovery responses and/or to set forth his rationale as to why the particular document disclosure is incomplete.

3. On June 18, 2002, undersigned counsel received Plaintiff's Brief in Support of Motion to Compel Discovery for production of Defendants, Wexford Health Sources, Inc. and Dr. Symons, M.D.'s documents. That Brief did not comply with this Honorable Court's Order dated June 12, 2002.

4. Due to previously scheduled commitments in other matters, undersigned defense counsel is in need of an extension of time until July 15, 2002 within which to obtain an affidavit from his client and to prepare and file a brief in opposition to Plaintiff's pending Motion to Compel Discovery.

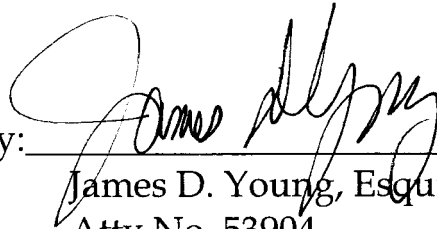
5. The requested extension of time is brief in duration, it will not prejudice any party's substantive rights and it will not unduly delay the adjudication of this matter on the merits.

WHEREFORE, the Wexford Defendants respectfully request that this Honorable Court grant their Motion for Enlargement of Time to file a brief and enter the accompanying Court Order.

Respectfully submitted,

Lavery, Faherty, Young &
Patterson, P.C.

By: _____



James D. Young, Esquire
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P.O. Box 1245

Harrisburg, PA 17108-1245

Attys for Wexford Health Sources,
Inc. and John Symons, M.D.


DATE: 7/3/02

CERTIFICATE OF SERVICE

I, Linda L. Gustin, an employee with the law firm of Lavery, Faherty, Young & Patterson, P.C., do hereby certify that on this 3rd day of July, 2002, I served a true and correct copy of the foregoing **Defendants, Wexford Health Sources, Inc. and John Symons, M.D.'s Motion to Enlarge Time to File a Brief** via U.S. First Class mail, postage prepaid, addressed as follows:

William Clark
#AY5585
SCI-Rockview
PO Box A
Bellefonte, PA 16823

John Talaber, Esquire
Office of Chief Counsel
PA Department of Corrections
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Camp Hill, PA 17011



Linda L. Gustin